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SBN 86196

8 Attorney for Defendant,
9 ZOILA MICHELLE ESTRADA

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 ZOILA MICHELLE ESTRADA,

16 Defendant,

) **Case No.: 23-CR-00564-MWF-6**

) **UNOPPOSED EX PARTE**

) **APPLICATION TO MODIFY BOND**

) **CONDITIONS OF PRETRIAL**

) **RELEASE (FILED**

) **CONCURRENTLY WITH**

) **PROPOSED ORDER)**

17
18 Through counsel of record, Zoila Michelle Estrada, hereby applies to this
19 Court for an order as follows:

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21 Defendant requests that the Court modify the conditions of her bond and
22 include her mother, Edith Maldonado, as additional surety.

23
24 This ex parte application is based on the declaration of counsel, as well as
25 the court file, and any other information that the Court may consider.

Declaration of Carlos L. Juarez

I, Carlos L. Juarez, hereby declare:

1. I am the attorney of record for the defendant Zoila Michelle Estrada appointed through the Criminal Justice Act.

2. On November 15, 2022, the Court granted the Defendant's request for bond in the sum of \$100,000.00 with Full Deeding of Property located at 41121 Pascal Lane, Lake Elsinore, CA 92532. This was to be accomplished by the Defendants' sister Jacqueline Marquez. It turns out that the Defendant's mother, Edith Maldonado, is also named as owner of the property.

3. The parties agree that Edith Maldonado be named as an additional surety in order to satisfy the requirement of full deeding by the parties that own the property.

4. I have been in contact with Assistant United States Attorney Benedetto L. Balding, and he agrees to this modification.

All other terms and conditions of pre-trial release shall remain in full force and effect.

Dated: December 8, 2023

By: /s/ Carlos L. Juarez
Carlos L. Juárez